

Summary of Personnel Training and Qualification Inspection Report Response Deficiencies

The following are the deficiencies identified with the attachment to the BNFL Personnel Training and Qualification Inspection Report response letter:

Page 1 of 3, item 2, "Reason for the Finding," cites "improper resource allocation to the Project Quality Assurance (QA) audit and surveillance activities," as the primary reason for the Finding. However, the remainder of the item does not provide sufficient detail for the RU to assess, with respect to this reason, the adequacy of the corrective actions described in later items. Additional details are needed that identify the specific resources and specific tasks that were improperly allocated and how this situation will be avoided in the future.

Page 2 of 3, item 3, "Corrective steps that have been taken and the results achieved," does not fully describe the actions taken or the results achieved to correct the deficiencies identified in the Finding. For example:

1. The third bullet reiterates the recommended actions from Deficiency Report DR-W375-00-QA00017_0 that were identified on March 9, 2000. However, the recommended actions lack specific information concerning process improvements such as how the timeliness requirements will be implemented. Also, not described is whether or not the actions have been fully completed and the specific results achieved by those actions.
2. The fourth bullet describes a self-assessment (SA-W375-00-00023, dated March 14, 2000) that identified numerous assessment activity documents that had been completed but not formally issued. However, the specific actions taken and the specific results achieved in response to this self-assessment are not described.
3. The fourth bullet further states that evaluation of the significance of items identified from self-assessment SA-W375-00-00023 has been incorporated into a Project Quality Improvement Action Plan (PQIAP), dated March 29, 2000. However, the results of the evaluation and the specific actions taken in accordance with the PQIAP and the specific results achieved to address the Finding are not described.

Page 2 & 3 of 3, item 4, "The corrective steps that will be taken to avoid further Findings," does not fully describe the actions that will be taken.

1. The first bullet stated that K13P053, "Quality Assurance Surveillance," "is being revised to clarify the requirements for completion of assessment activities." However, the response does not provide specific information regarding how the procedure will be revised to address the Finding.
2. The second bullet stated that "Specific elements of the action plans in the PQIAP that will complement Project actions to strengthen QA assessments are: (1) AP-2, Corrective Action Management System (CAMS), and (2) AP-3, Internal Assessment Program." However, the response provides no specific corrective steps within the elements of the

PQIAP action plans that address the Finding. For example, the response does not specifically address “Early identification of potential problems through structured surveillance and audits,” or failure to identify potential problems to those responsible for potential corrective actions.

Page 3 of 3, item 5, “The date when full compliance with applicable commitments in the Authorization Basis as it applies to the Finding, i.e., Quality Assurance Program and Implementation Plan, will be achieved,” does not fully describe the actions for which the dates are provided.

1. The first bullet identifies that the Quality Assurance Surveillance procedure, K13P053, will be revised to incorporate updated management direction on performance and completion of surveillances, including training of QA personnel by July 28, 2000. However, the specific management direction and revisions to address the Finding are not described.
2. The second bullet states that Action Plans 2 and 3 of the PQIAP will be completed by June 30 and July 28, 2000, respectively. However, as previously stated, the specific corrective steps contained in these elements that address the Finding are not described. The revised response should address the timing for completing those specific corrective steps.